

**EXCERPTS FROM THE DEPOSITION OF  
ROBYN DENHOLM  
TAKEN OCTOBER 5, 2021**

1                   IN THE UNITED STATES DISTRICT COURT  
2                   FOR THE NORTHERN DISTRICT OF CALIFORNIA  
3                   SAN FRANCISCO DIVISION  
4   IN RE: TESLA, INC.                           ) CIVIL ACTION NO:  
5   SECURITIES LITIGATION                        ) 3:18-cv-04865-EMC

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8                   VIDEOTAPED AND REMOTE ORAL DEPOSITION OF  
9                   ROBYN DENHOLM

10                   OCTOBER 5, 2021  
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12                   VIDEOTAPED AND REMOTE ORAL DEPOSITION OF ROBYN  
13                   DENHOLM, produced as a witness at the instance of the  
14                   PLAINTIFFS, and duly sworn, was taken in the above-styled  
15                   and numbered cause on the 5th day of October, 2021, from  
16                   10:51 a.m. to 3:21 p.m., before Kathryn R. Baker, CSR,  
17                   RPR, in and for the State of Texas, reported by machine  
18                   shorthand in the City of Austin, State of Texas, pursuant  
19                   to the Federal Rules of Civil Procedure.

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24                   REPORTED BY KATHRYN R. BAKER, RPR, CSR  
25                   JOB #200188

1 A P P E A R A N C E S

2 FOR THE PLAINTIFFS:

3 By: Elizabeth Tripodi, Esq.  
Kathy Ames Valdivieso, Esq.  
4 LEVI & KORSINSKY  
1101 30th Street NW  
Washington, DC 20007

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6 FOR TESLA:

7 By: Patrick Gibbs, Esq.  
Joshua Walden, Esq.  
8 COOLEY  
3175 Hanover Street  
9 Palo Alto, California 94304

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11 ALSO PRESENT:

12 Mr. Marshall Fox, Videographer

13 Ms. Candice Jackman, in-house counsel, Tesla

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## 1 PROCEEDINGS

2 THE VIDEOGRAPHER: We're now on the record.

3 The time is 10:51.

4 This is the remote videotaped deposition of  
5 Robyn Denholm on October 5th, 2021, in case, In Re: Tesla,  
6 Inc., Securities Litigation, in the United States District  
7 Court, Northern District of California, San Francisco  
8 Division.9 This deposition is being held remotely over  
10 Zoom. My name is Marshall Fox. I am the certified legal  
11 video specialist with TSG Reporting. The court reporter  
12 today is Kathryn Baker, also in association with TSG  
13 Reporting.14 Due to the ongoing COVID-19 precautions,  
15 all parties are participating remotely. I will not be in  
16 the same room with the witness. Instead, I will record  
17 this videotaped deposition remotely. The reporter also  
18 will not be in the same room and will swear the witness  
19 remotely.20 If counsel could please state their  
21 appearance for the record and stipulate to the validity of  
22 this remote recording and remote swearing.23 MS. TRIPODI: Good morning. Elizabeth  
24 Tripodi of Levi & Korsinsky, LLP, on behalf of the  
25 plaintiff. With me today is my colleague, Kathy Ames,

1 also of Levi & Korsinsky.

2 And plaintiffs stipulate to the validity.

3 MR. GIBBS: Good morning. This is Patrick  
4 Gibbs from Cooley on behalf of the defendants in the case,  
5 including Ms. Denholm. Also with me today are Josh  
6 Walden, also from Cooley, and Candice Jackman, in-house  
7 counsel from Tesla.

8 We also stipulate to the remote deposition  
9 proceeding.

10 THE VIDEOGRAPHER: Thank you very much.

11 If the court reporter will please swear in  
12 the witness.

13 ROBYN DENHOLM,

14 having been first duly sworn, testified as follows:

15 [REDACTED]

16 [REDACTED]

17 [REDACTED]

18 [REDACTED]

19 [REDACTED]

20 [REDACTED]

21 [REDACTED]

22 [REDACTED]

23 [REDACTED]

24 [REDACTED]

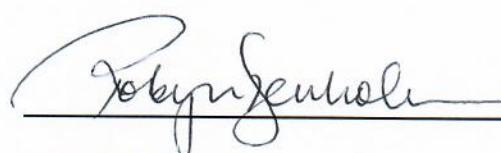
25 [REDACTED]

**DEPOSITION TESTIMONY  
FILED UNDER SEAL**

**ERRATA  
FILED UNDER SEAL**

## 1 ACKNOWLEDGMENT OF DEPONENT

2 I, Robyn Denholm, do hereby certify that I  
3 have read the foregoing pages, and that the same is a  
4 correct transcription of the answers given by me to the  
5 questions therein propounded, except for the corrections  
6 or changes in form and substance, if any, noted on the  
7 attached Errata.

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10 11/11/21

11 WITNESS NAME

12 DATE

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2                   FOR THE NORTHERN DISTRICT OF CALIFORNIA  
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4   IN RE: TESLA, INC.                                   ) CIVIL ACTION NO:  
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8                   REPORTER'S CERTIFICATION  
9                   ORAL DEPOSITION OF ROBYN DENHOLM  
10                  OCTOBER 5, 2021  
11                  (CONDUCTED REMOTELY VIA ZOOM)  
12                  \*\*\*\*\*  
13                  I, Kathryn R. Baker, RPR, a Certified Shorthand  
14                  Reporter in and for the State of Texas, hereby certify to  
15                  the following:  
16                  That the witness, ROBYN DENHOLM, was duly sworn  
17                  by the officer and that the transcript of the oral  
18                  deposition is a true record of the testimony given by the  
19                  witness;  
20                  I further certify that pursuant to FRCP Rule  
21                  30(f)(1) that the signature of the deponent:  
22                  \_X\_ was requested by the deponent or a party  
23                  before the completion of the deposition and is to be  
24                  returned within 30 days from the date of receipt of the  
25                  transcript. If returned, the attached Errata contain any

1 changes and the reasons therefor;

2 \_\_\_\_\_ was not requested by the deponent or a party  
3 before the completion of the deposition.

4 I further certify that I am neither counsel for,  
5 related to, nor employed by any of the parties or  
6 attorneys in the action in which this proceeding was  
7 taken, and further that I am not financially or otherwise  
8 interested in the outcome of the action;

9 Subscribed and sworn to on this 16th day of  
10 October, 2021.

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13 KATHRYN R. BAKER, RPR, CSR #6955  
14 Expiration Date: 04/30/2023  
Firm Registration No. 615  
TSG Reporting

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